

**VIRGINIA HILL**  
**260 Rose Hill Rd.**  
**Wytheville, VA 24382**

**Plaintiff**

**v.**

**SOUTHERN MARYLAND ELECTRIC**  
**COOPERATIVE, INC.**

**Serve On:**

**Austin J. Slater, Jr.**  
**Resident Agent**  
**15035 Burnt Store Rd.**  
**PO Box 1937**  
**Hughesville, MD 20637**

**And**

**SABRINA HILL (as Co-Personal Representative**  
**Of ESTATE OF WILLIAM SPENCER HILL)**

**Serve On:**

**Sabrina Hill**  
**25371 Three Notch Rd., Unit B**  
**Hollywood, MD 20636**

**And**

**MELANIE HILL (as Co-Personal Representative\***  
**Of ESTATE OF WILLIAM SPENCER HILL)**

**Serve On:**

**Melanie Hill**  
**PO Box 86**  
**20260 Breezy Point Rd.**  
**Coltons Point, MD 20626**

**Defendants**

\* \* \* \* \*

**COMPLAINT FOR DECLARATORY JUDGMENT**

Now comes Plaintiff, Virginia Hill, by and through her attorneys, Justin A. Wallace, Esq., the  
Law Office of Justin A. Wallace, LLC, Andrew C. Cooper, and Bader and Cooper, and brings this

9. On or about November 19, 2010, William Spencer Hill was promoted to a management position and his premium and policy benefits were increased.

10. When William Spencer Hill was promoted to management he remained covered under the Policy.

11. At no point did William Spencer Hill remove Virginia Hill as the beneficiary under the Policy.

12. On or about January 9, 2022, William Spencer Hill was pronounced deceased following a motor vehicle collision.

13. Upon information and belief, the death of William Spencer Hill made benefits for the death of William Spencer Hill pursuant to the Policy due and owing.

14. On or about January 13, 2022, at approximately 9:22 am, Plaintiff Hill received a phone call from Victoria St. Arnold, an employee of SMECO, stating that Plaintiff Hill was the named beneficiary under the Policy.

15. No other beneficiary has ever been designated by William Spencer Hill under the Policy.

16. Upon information and belief, SMECO now contests that Plaintiff Hill is the beneficiary under the Policy.

17. Upon information and belief, SMECO is responsible for administering and/or requesting payment pursuant to the Policy to the proper beneficiary.

18. Upon information and belief, SMECO has failed to request payment be made to Virginia Hill under the Policy.

19. Upon information and belief, SMECO contests that Virginia Hill is the beneficiary under the Policy.

20. Upon information and belief, SMECO asserts that the Estate is the proper beneficiary under the Policy.

21. All documents regarding the Policy are within the control, custody, and/or possession of Defendant SMECO.

22. There now exists a justiciable issue in controversy surrounding the legal status and/or rights of the parties to the Policy, Plaintiff seeks declaratory judgment.

WHEREFORE, Plaintiff Virginia Hill, requests:

1. That this Court determine and adjudicate the rights and legal relations of the parties with respect to the subject Policy.

2. That this Court find and declare that the Plaintiff is the sole beneficiary of the death benefits under the Policy.

3. That that this Court award to Plaintiff the costs of these proceedings.

4. That this Court order that SMECO take all action necessary to effectuate payment of the death benefits under the Policy to beneficiary Virginia Hill.

5. That this Court determine that payment to Plaintiff was due and owing on or about January 9, 2022.

6. That this Court determine order that payment to Plaintiff be made with pre-judgment interest and post-judgment interest pursuant to Maryland Law.

7. Such other and further relief as the nature of justice may require.

Respectfully submitted,

/S/

Justin A. Wallace – 13270

CPF #: 1512160342

Law Office of Justin A. Wallace

3635 Old Court Rd., Ste. 201-A  
Pikesville, Maryland 21208  
(410) 759-8320  
[justin@jwallacelaw.com](mailto:justin@jwallacelaw.com)  
*Attorney for Plaintiff*

/S/

---

Andrew C. Cooper  
**CPF #: 8212010079**  
BADER AND COOPER  
201 N. Charles Street, Suite 2301  
Baltimore, Maryland 21201  
(410) 727-0360  
(410) 752-7905 - fax  
[baderandcooper@comcast.net](mailto:baderandcooper@comcast.net)  
*Attorney for Plaintiff*